

EXHIBIT C



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January 3, 2025

VIA EMAIL: dkaston@kalawny.com

David E. Kaston, Esq.
Kaston & Aberle, LLP
259 Mineola Boulevard
Mineola, NY 11501

Re: E.C./Sarit Chen v. Oorah Inc. d/b/a The Zone and
Chill Zone
Index No.: 527685/2024
Date of Loss: 8/4/2023
Our File No.: 24-390

Dear Mr. Kaston:

As you know, we were retained to represent Oorah Inc. in the above matter. The infant plaintiff was allegedly injured at the camp on August 4, 2023 because of an alleged condition on the premises.

As your clients were citizens of the State of Israel, and the Oorah Inc. entity is a New Jersey citizen, diversity of citizenship exists.

In an effort to avoid removal of this action to the United States District Court for the Northern District of New York, we request that you sign the attached stipulation to limit any damages recoverable by the plaintiffs to \$75,000, thus rendering the removal as moot.

If you do not sign the stipulation, please sign the bottom of this letter indicating you do not consent to the limitation of damages.

Please return the stipulation and letter to me by January 6, 2025.

MIRANDA SLONE SKLARIN VERVENIOTIS LLP

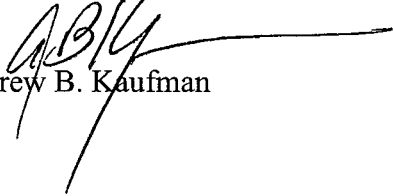
JANUARY 3, 2025

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Should you fail to do so, we intend to immediately remove this matter to the designated federal court.

Very truly yours,

MIRANDA SLONE SKLARIN VERVENIOTIS LLP


Andrew B. Kaufman

Enc. Stipulation limiting damages

Plaintiffs will not consent to limit damages to \$75,000

David E. Kaston, Esq.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

E.C., an infant under the age of eighteen years by his mother
and natural guardian, SARIT CHEN,

Plaintiff,

-against-

OORAH INC. d/b/a THE ZONE AND CHILL ZONE,

Defendant.

Index No.: 527685/2024

**STIPULATION CAPPING
DAMAGES TO \$75,000**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys of record for all parties to this action, that the total amount plaintiff is entitled to recover for aggregate damages shall not be greater than \$75,000.00 (seventy-five thousand dollars), inclusive of attorney's fees, but exclusive of interest and costs.

This Stipulation may be executed in counterparts and an electronic copy shall be deemed an original for all purposes.

Dated: Mineola, New York
January __, 2025

KASTON & ABERLE, LLP

**MIRANDA SLONE
SKLARIN VERVENIOTIS LLP**

By: David E. Kaston, Esq.
Attorneys for Plaintiffs
259 Mineola Boulevard
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By: Andrew B. Kaufman, Esq.
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File No.: 24-390